

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>Jeffrey Traurig TRAURIG LAW LLC One University Plaza, Suite 124 Hackensack, NJ 07601 Tel: (646) 974-8650 E-mail: jtraurig@trauriglaw.com <i>Proposed Local Counsel to the Fee Examiner</i></p>	<p>Robert J. Keach, Esq. (pro hac vice pending) BERNSTEIN SHUR SAWYER & NELSON, P.A. 100 Middle Street Portland, ME 04104 Tel: (207) 774-1200 Fax: (207) 774-1127 E-Mail: rkeach@bernsteinshur.com <i>Fee Examiner</i></p> <p>BERNSTEIN SHUR SAWYER & NELSON, P.A. Letson Douglass Boots, Esq. (pro hac vice pending) 100 Middle Street Portland, ME 04104 Tel: (207) 774-1200 Fax: (207) 774-1127 E-Mail: lboots@bernsteinshur.com <i>Proposed Counsel to the Fee Examiner</i></p>
<p>In Re:</p> <p>LTL MANAGEMENT LLC,</p> <p style="text-align: center;">Debtor</p>	<p>Case No.: 21-30589 (MBK)</p> <p>Judge: Michael B. Kaplan</p> <p>Chapter 11</p>

**APPLICATION FOR RETENTION OF TRAURIG LAW LLC
AS COUNSEL TO THE FEE EXAMINER**

1. The applicant, Robert J. Keach (the “Fee Examiner”), is the (check all that apply):

- ☐ Trustee: ☐ Chap. 7 ☐ Chap. 11 ☐ Chap. 13.
- ☐ Debtor: ☐ Chap. 11 ☐ Chap. 13
- ☐ Official Committee of _____

*☒ Fee Examiner ☒ Chap. 11

2. The Fee Examiner seeks to retain the following professional, Traurig Law LLC (“Traurig”), to serve as (check all that apply):

- ☒ Attorney for*: ☐ Trustee ☐ Debtor-in-Possession
- *☒ Fee Examiner
- ☐ Official Committee of _____
- ☐ Accountant for: ☐ Trustee ☐ Debtor-in-possession
- ☐ Official Committee of _____
- ☐ Other Professional:
- ☐ Realtor ☐ Appraiser ☐ Special Counsel
- ☐ Auctioneer ☐ Other (specify): _____

3. The employment of Traurig is necessary because:

The Fee Examiner requires New Jersey local counsel to perform certain legal services during the pendency of his appointment.

4. Traurig has been selected because:

The Fee Examiner selected Traurig as his local counsel because of the firm’s extensive legal experience in and knowledge of corporate reorganization and bankruptcy law. Traurig possesses the requisite legal expertise, knowledge, and locale to support the Fee Examiner and proposed lead counsel, Bernstein Shur, on matters that are likely to arise in these cases. As detailed further below, the services provided by Traurig will not result in the duplication of services provided by proposed lead counsel, Bernstein Shur, as Traurig will generally not be involved in the review and assessment of requests for allowance of fees and expenses by certain professionals.

Additional details regarding Traurig and its qualifications are set forth in detail in the Certification of Jeffrey Traurig, attached hereto as Exhibit A.

5. Traurig’s professional services to be rendered are as follows:

Subject to further order of the Court, the Fee Examiner requests the retention and employment of Traurig to provide services, consistent with the Fee Examiners’ scope of duties set forth in the *Order Appointing an Independent Fee Examiner and Establishing Procedures* [Docket No. 1922] including:

(a) Coordinating filings and assisting the Fee Examiner with compliance with:

- i. the Local Rules of the United States Bankruptcy Court, District of New Jersey;

- ii. the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [Docket No. 322] (the “Case Management Order”); and
- iii. the *Order Establishing Procedures for Interim Compensation and Reimbursement for Retained Professionals* [Docket No. 761], as may be amended (the “Interim Compensation Order”).

(b) Representing the Fee Examiner in Court; and

(c) Providing such other services as the Fee Examiner may deem necessary or appropriate.

6. The proposed arrangement for compensation is as follows:

The Fee Examiner, subject to the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and further orders of the Court, proposes to have the Debtor’s estate compensate Traurig at Traurig’s regular hourly rates for legal and non-legal personnel and to reimburse Traurig for all reasonable and necessary expenses under the standards set forth in 11 U.S.C. §§ 330 and 331, as well as the Guidelines. Traurig’s hourly rate of \$425 per hour. In the normal course of business, from time to time, Traurig may revise the regular hourly rates, provided, however, Traurig will provide at least ten (10) days advance notice of the revised regular hourly rates to counsel to the Fee Examiner, the Debtor, the U.S. Trustee, and counsel to any official committees appointed in these cases.

7. To the best of the Fee Examiner’s knowledge, Traurig’s connection with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

- ☐ None
- ☒ Describe connection: See Cert. of Jeffrey Traurig, attached hereto as Exhibit A.

8. To the best of the Fee Examiner’s knowledge, Traurig (check all that apply):

- ☒ does not hold an adverse interest to the estate.
- ☒ does not represent an adverse interest to the estate.
- ☒ is a disinterested person under 11 U.S.C. § 101(14).
- ☐ does not represent or hold any interest adverse to the debtor or the estate with

respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

☐ Other; explain: _____

See also Cert. of Jeffrey Traurig, attached hereto as Exhibit A.

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: N/A

The Fee Examiner respectfully requests authorization to employ Traurig to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may determine and allow.

Date: April 1, 2022

/s/ Robert J. Keach

Robert J. Keach
Fee Examiner